



FILED 6/21/14

October 20, 2014

Rosa Shaw, President
American Health Institute
10138 U.S. Highway 19
Port Richey, FL 34668-3743

UPS Tracking Number:
1ZA879640291743822

RE: **Final Program Review Determination**
OPE ID: 04176900
PRCN: 2014-3-04-28569

Dear Mrs. Shaw:

The U.S. Department of Education's (Department's) School Participation Division - Atlanta issued a program review report on June 25, 2014 covering American Health Institute's (AHI) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2012-2013 and the 2013-2014 award years. AHI's final response was received on August 26, 2014. A copy of the program review report (and related attachments) and AHI's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by AHI upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Purpose:

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department, (3) notify the institution of its right to appeal, and (4) close the review.

Liabilities totaling \$12,051 have been repaid by AHI. No further action is required.

Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report does not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample. In addition, Appendices B and C also contain PII.

Federal Student Aid

AN OFFICE of the U.S. DEPARTMENT of EDUCATION
School Participation Division - Atlanta
61 Forsyth Street S.W., Room 18T40
Atlanta, Georgia 30303-8930

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(e)(1), (e)(2), and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Lonnie Seal at (404)974-9240.

Sincerely,

(b)(6)

A rectangular box with a black border, used to redact the signature of Christopher Miller. The text "(b)(6)" is written in the top left corner of the box.

Christopher Miller
Division Director

Enclosure:

Protection of Personally Identifiable Information
Program Review Report (and appendices)
Final Program Review Determination Report (and appendices)

cc: Virginia Barreto, Financial Aid Administrator
Florida Commission for Independent Education
Accrediting Bureau of Health Education Schools

Prepared for
American Health Institute

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION

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OPE ID 04176900
PRCN 2014-3-04-28569

Prepared by:
U.S. Department of Education
Federal Student Aid
School Participation Division - Atlanta

Final Program Review Determination

October 20, 2014

61 Forsyth Street SW, Room 18T40
Atlanta, Georgia 30303-8930
StudentAid.gov

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- Appendix C: Program Review Report

A. Institutional Information

American Health Institute
10138 U.S. Highway 19
Port Richey, Florida 34668

Type: Proprietary

Highest Level of Offering: Certificate

Accrediting Agency: Accrediting Bureau of Health Education Schools

Current Student Enrollment: 52 (2014)

% of Students Receiving Title IV: 98% (2014)

Title IV Participation G5:

2012/2013

Federal Pell	\$ 75,749
William D. Ford Federal Direct Loan Program (Direct Loan)	\$227,732
Federal Supplemental Education Opportunity Grant (SEOG)	\$ 3,900

Default Rate FFEL/DL:	2011 - 0%
	2010 - 0%
	2009 - 0%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at American Health Institute (AHI) from April 7, 2014 to April 11, 2014. The review was conducted by Lonnie Seal, Lynette Davis and Robert Scott.

The focus of the review was to determine AHI's compliance with the statutes and Federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of AHI's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2012-2013 and 2013-2014 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning AHI's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve AHI of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

C. Findings and Final Determinations

Resolved Findings:

Finding(s) #2, #4 - #9

AHI has taken the corrective actions necessary to resolve findings #2, and #4-#9, of the program review report. Therefore, these findings may be considered closed. Appendix C contains the institution's written response related to the resolved findings. Findings requiring further action by AHI are discussed below.

Findings with Final Determinations

The program review report finding(s) requiring further action are summarized below. At the conclusion of each finding is a summary of AHI's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on June 25, 2014 is attached as Appendix C.

Finding 1: Conflicting Information in Student File

Citation: 34 C.F.R. 668.24 states a school must keep comprehensive, accurate program and fiscal records in administering Title IV programs. There should be no discrepancies found when comparing a data item across various forms. An institution's records must be accurate, and must demonstrate a clear audit trail.

Noncompliance: During the course of the review, 4 students were identified with conflicting information in their student file. Detailed information regarding these 4 students is provided below.

Student #6: The review of the individual student's account ledger revealed a credit balance occurred on 2/5/2014 in the amount of \$260. However, in the student's financial aid file, a form entitled *Credit Balance on Account* indicates the credit balance is \$560.

Student #7: The student states on the 2012-2013 ISIR "No" in the block "First Bachelor's Degree by 7/1/2012." However, information in the student's file indicates that the student completed a Bachelor of Arts degree as of January 1, 2000, from Saint Leo University.

Student #18: This student was selected for verification (Verification Code: V1) for the 2013-2014 award year. The 2013-2014 ISIR lists 3 in the household, but the 2013-2014 Verification Worksheet filled out by the student lists 2. As stated in the 2013-2014, Verification Guides: an institution does not have to verify household size in the following situations:

- For a dependent student, the household size reported is 3 for married parents or 2 for a single, divorced, separated, or widowed parent.

However, once the student listed the information on AHI's 2013-2014 Verification Worksheet, this discrepancy should have been addressed, as it directly conflicted with information on the student's ISIR.

Student #26: This student indicated on their AHI Application for Admission's form that she had earned a Bachelor of Science from Springfield College. However, on the 2013-2014 ISIR the student answered "No" in the box that states "First Bachelor's Degree by

7-1-2013." Regardless of the aforementioned conflicting information, AHI awarded and disbursed \$5,645 in Federal Pell funds to the students account as recorded in the Department's Common, Origination, and Disbursement (COD) system.

Required Action: AHI was required to improve communication and coordination with various departments (instructors, guidance counselor, staff responsible for attendance, etc.). The frequency of instances of conflicting information was cause for concern. AHI was required to develop a quality control policy/procedure to ensure that the information collected on all institutional forms was consistent.

Moreover, the institution was required to resolve the conflicting discrepancies listed above. If the students' Expected Family Contribution (EFC), scheduled award, eligibility, and/or expected disbursements changed as a result of the required resolutions, the institution was required to provide the results in its response to this report.

Additionally, the institution was informed that if there was a change to the student's EFC, the institution would be liable for any over award disbursed for the 2012-2013 and 2013-2014 award years.

Furthermore, in response to this Program Review Report, AHI was required to develop an interdepartmental policy that addressed the inconsistency of data across institutional forms. This policy was required to offer an adequate solution to remedy these discrepancies.

AHI's Response: The institution concurred with this finding and responded to each student's situation.

Final Determination: Concerning the updated quality control policy and the institution's responses for students #6, #7, and #18, these components of finding 1 have been accepted by the Department.

Moreover, subsequent to AHI's program review response, concerning student #26, the institution e-mailed additional documents to comprehensively resolve additional requirements, which were received on October 7, 2014, that confirmed that the institution has returned the respective Pell funds in the amount of \$5,645. Moreover, because the downward adjustments have been made in COD, no further action is required for this finding; therefore, this finding is considered closed.

Finding 3: Return of Title IV Funds (R2T4) Made Late

Citation: Per 34 C.F.R. § 668.22 states that when a recipient of title IV grant or loan assistance withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must determine the

amount of title IV grant or loan assistance that the student earned as of the student's withdrawal date in accordance with paragraph (e) of this section.

(B) In the case of a program that is measured in clock hours, the student does not complete all of the clock hours and weeks of instructional time in the payment period or period of enrollment that the student was scheduled to complete; or

(b) Withdrawal date for a student who withdraws from an institution that is required to take attendance. (1) For purposes of this section, for a student who ceases attendance at an institution that is required to take attendance, including a student who does not return from an approved leave of absence, as defined in paragraph (d) of this section, or a student who takes a leave of absence that does not meet the requirements of paragraph (d) of this section, **the student's withdrawal date is the last date of academic attendance as determined by the institution from its attendance records.**

(3)(i) An institution is required to take attendance if—

(A) An outside entity (such as the institution's accrediting agency or a State agency) has a requirement that the institution take attendance;

(j) Timeframe for the return of title IV funds. (1) An institution must return the amount of title IV funds for which it is responsible under paragraph (g) of this section as soon as possible but no later than 45 days after the date of the institution's determination that the student withdrew as defined in paragraph (l)(3) of this section. The timeframe for returning funds is further described in §668.173(b).

Noncompliance: During the course of the review, three students were identified with having R2T4 calculations performed timely; however, the unearned Title IV funds associated with the respective R2T4 calculations were returned after the 45 day threshold.

The table below provides student specific information.

Student Number	Withdrawal Determination Date	Title IV Program	Amount Returned	Date of Return (COD)	Days Late
24	12/5/2013	Pell Grant	\$2,721	3/27/2014	112
		Direct Unsub	\$1,587	2/28/2014	85
		Direct Sub	\$166	3/3/2014	88
8	3/14/2013	Direct Unsub	\$1,980	1/14/2014	306
		Direct Sub	\$1,447	1/14/2014	306
1	10/11/2012	Direct Sub	\$1,545	3/26/2013	166
		Pell Grant	\$1,008	3/25/2013	165

Required Action: AHI was required, as prescribed in 34 C.F.R. § 668.173, to determine the dollar amount of refunds that were made or should have been made for the 2012-2013 and the 2013-2014 award years to include the students listed in finding 3. In its response, AHI was required to provide to the Department the results of the required file review in an Excel spreadsheet and in the following format:

- (1) Student's Name
- (2) Student's Social Security Number
- (3) Award Year
- (4) Title IV Refund by Program (Pell, Direct Loans, and FSEOG).
- (5) Determination Date
- (6) Date Due
- (7) Date Paid
- (8) Days Late

AHI's Response: The institution concurred with this finding. In accordance with the program review report, AHI performed a full file review of refunds that were made or should have been made for the 2012-2013 and the 2013-2014 award years to include the students listed in finding 3. The results of the file review were provided in an Excel spreadsheet and in the format prescribed by the Program Review Report.

The file review indicated additional late refunds and one additional refund in the amount of \$5,391.36, which is due to the United States Department of Education. The total refunds that were made or should have been made by program are:

Pell	\$ 16,395.12
Direct Loan Subsidized	\$ 17,357.48
Direct Loan Unsubsidized	\$ 15,451.00
Total Refunds	\$ 49,203.60

Final Determination: Concerning the additional refund discovered during the institution's file review in the amount of \$5,391.36, proof of the return of Title IV funds to the Department has been provided by AHI in its response to the Program Review Report.

Additionally, due to the number of late refunds, the institution is required to have on file with the Department an irrevocable Letter of Credit (LOC) equal to 25% of the total refunds the institution made, or should have made, during the most recently closed fiscal year (34 C.F.R. § 668.173(d)). Instructions for submitting this LOC will be sent to the institution under separate cover.

D. Summary of Liabilities

The total amount calculated as liabilities from the findings in the program review determination is as follows. AHI has repaid all liabilities.

Established Liabilities - Duplicate Liabilities Removed		
Liabilities	Pell	DL / FFEL
Finding 1	\$5,645.00	\$ -
*Finding 2	\$1,015.00	\$ -
Finding 3	\$ 691.00	\$ 4,700.00
Sub-total	\$7,351.00	\$ 4,700.00
Combined Total	\$ 12,051	

*Note: During the program review at AHI, an R2T4 error was detected and corrected on-site which resulted in the institution returning \$1,015 to its Federal Pell Program account. For additional information concerning this finding, see Finding 2 in the enclosed program review report.

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.



FILE COPY

June 25, 2014

Rosa Shaw, President
American Health Institute
10138 U.S. Highway 19
Port Richey, FL 34668-3743

UPS Tracking Number:
1ZA879640292666815

RE: **Program Review Report**
OPE ID: 04176900
PRCN: 2014-3-04-28569

Dear Mrs. Shaw:

From April 7, 2014 through April 11, 2014, Lonnie Seal, Robert Scott and Lynette Davis conducted a review of American Health Institute's (AHI) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by AHI. The response should include a brief, written narrative for each finding that clearly states AH's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, AHI must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report¹ and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –
 - a. A written statement addressing the institution's response;
 - b. A written statement of the basis for such report or determination; and
 - c. A copy of the institution's response.

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written response will not be attached to the FPRD. However, it will be retained and available for

¹ A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

Federal Student

An OFFICE of the U.S. DEPARTMENT of EDUCATION
School Participation Division – Atlanta
61 Forsyth Street SW, Room 18T40
Atlanta, Georgia 30303-8930

inspection by AHI upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution's response should be sent directly to Lonnie Seal of this office within 60 calendar days of receipt of this letter.

Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report do not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data /documents containing PII.


Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Lonnie Seal at (404)974-9240 or Lonnie.Seal@ed.gov.

Sincerely,

(b)(6); (b)(7)(C)

 David Smittick
Compliance Manager

cc: Virginia Barreto, Financial Aid Administrator

Enclosure:

Program Review Report (and appendices)
Protection of Personally Identifiable Information

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

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Prepared for

American Health Institute

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION

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OPE ID 04176900
PRCN: 2014-3-04-28569

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Division-Atlanta

Program Review Report

June 25, 2014

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A. Institutional Information

American Health Institute
10138 U.S. Highway 19
Port Richey, Florida 34668

Type: Proprietary

Highest Level of Offering: Certificate

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% of Students Receiving Title IV: 98% (2014)

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	2010 - 0%
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B. Scope of Review

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The focus of the review was to determine AHI's compliance with the statutes and Federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of AHI's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2013 and 2014 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning AHI's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve AHI of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

C. Findings

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by AHI to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1: Conflicting Information in Student File

Citation: 34 C.F.R. 668.24 states a school must keep comprehensive, accurate program and fiscal records in administering Title IV programs. There should be no discrepancies found when comparing a data item across various forms. An institution's records must be accurate, and must demonstrate a clear audit trail.

Noncompliance: During the course of the review, 4 students were identified with conflicting information in their student file. Detailed information regarding these 4 students is provided below.

Student #6: The review of the individual student's account ledger revealed a credit balance occurred on 2/5/2014 in the amount of \$260. However, in the student's financial aid file, a form entitled *Credit Balance on Account* indicates the credit balance is \$560.

Student #7: The student states on the 2012-2013 ISIR "No" in the block "First Bachelor's Degree by 7/1/2012." However, information in the student's file indicates that the student completed a Bachelor of Arts degree as of January 1, 2000, from Saint Leo University.

Student #18: This student was selected for verification (Verification Code: V1) for the 2013/2014 award year. The 2013-2014 ISIR lists 3 in the household, but the 2013-2014 Verification Worksheet filled out by the student lists 2. As stated in the 2013-2014, Verification Guides: an institution does not have to verify household size in the following situations:

- For a dependent student, the household size reported is 3 for married parents or 2 for a single, divorced, separated, or widowed parent.

However, once the student listed the information on AHI's 2013-2014 Verification Worksheet, this discrepancy should have been addressed, as it directly conflicted with information on the student's ISIR.

Student #26: This student indicated on their AII Application for Admission's form that she had earned a Bachelor of Science from Springfield College. However, on the 2013-2014 ISIR the student answered "No" in the box that states "First Bachelor's Degree by 7-1-2013." Regardless of the aforementioned conflicting information, AHI awarded and disbursed \$5,645 in Federal Pell funds to the student's account as recorded in COD.

Required Action: AHI must improve communication and coordination with various departments (instructors, guidance counselor, staff responsible for attendance, etc.). The frequency of instances of conflicting information is cause for concern. AII must develop a quality control policy/procedure to ensure that the information collected on all institutional forms is consistent.

Moreover, the institution must resolve the conflicting discrepancies above. If the students' EFC, scheduled award, eligibility, and/or expected disbursements change as a result of the required resolutions, the institution must provide the results with the response to this report.

If there is a change to the student's EFC, the institution will be liable for any over award disbursed for the 2012-2013 and 2013-2014 award years.

Additionally, in response to this Program Review Report, AHI must develop an interdepartmental policy that addresses the inconsistency of data across institutional forms. This policy must offer an adequate solution to remedy these discrepancies.

Finding 2: Return to Title IV (R2T4) Calculation Errors

Citation: 34 C.F.R. § 668.22 (a) (f) states when a recipient of Title IV grant or loan assistance withdraws from an institution during a payment period of enrollment in which the recipient began attendance, the institution must determine the amount of Title IV grant or loan assistance that the student earned as of the student's withdrawal date.

34 C.F.R. § 668.22 (e)(2) states the percentage of Title IV grant or loan assistance that has been earned by the student is equal to the percentage of the payment period or period of enrollment that the student completed as of the student's withdrawal date.

34 C.F.R. § 668.22 (f) (ii) states for purposes of paragraph (e)(2)(i) of this section, the percentage of the payment period or period of enrollment completed is determined—

In the case of a program that is measured in clock hours, by dividing the total number of clock hours in the payment period or period of enrollment into the number of clock hours scheduled to be completed as of the student's withdrawal date.

(B) The scheduled clock hours used must be those established by the institution prior to the student's beginning class date for the payment period or period of enrollment and must be consistent with the published materials describing the institution's programs, unless the schedule was modified prior to the student's withdrawal.

34 C.F.R. § 668.22 (i) states the total amount of unearned Title IV assistance to be returned is equal to the total amount of institutional charges incurred by the student for the payment period or period of enrollment multiplied by the percentage of Title IV grant or loan assistance that has not been earned by the student.

34 C.F.R. § 668.22 (g) states that the institution must return, in the order specified in paragraph (i) of this section, the lesser of—

(i) The total amount of unearned title IV assistance to be returned as calculated under paragraph (e)(4) of this section; or

(ii) An amount equal to the total institutional charges incurred by the student for the payment period or period of enrollment multiplied by the percentage of title IV grant or loan assistance that has not been earned by the student, as described in paragraph (e)(3) of this section.

(2) For purposes of this section, "institutional charges" are tuition, fees, room and board (if the student contracts with the institution for the room and board) and other educationally-related expenses assessed by the institution.

34 C.F.R. § 668.32 (a) (5) states a student is eligible to receive Title IV, HEA program assistance if the student either meets all of the requirements in paragraphs (a) through (m) of this section or meets the requirement in paragraph (n) of this section as follows:

The 2012-2013 Student Aid Handbook, Volume 5, pp. 30 states, "An institution may not delay its Return of Title IV funds. An institution is expected to begin the Return of Funds process immediately upon its determination that a student has withdrawn. The institution may not delay returning Title IV funds because it believes a student might return."

The 2012-2013 Student Aid Handbook, Volume 5, pp. 31 states, "**Institutions that are required to take attendance are expected to have a procedure in place for routinely monitoring attendance records to determine in a timely manner when a student withdraws. Except in unusual instances, the date of the institution's determination that the student withdrew should be no later than 14 days (less if the school has a policy requiring determination in fewer than 14 days) after the student's last date of attendance as determined by the institution from its attendance records.**"

Noncompliance: During the course of the review, one student was identified with an incorrect R2T4 calculation. Detailed information regarding this student is included below.

Student #24: This student was a full time Patient Care Technician Program¹ student with a start date of 11/19/2013. The student's last day of attendance was 11/21/2013.

On December 19, 2013, AHI performed an R2T4 calculation to determine the earned and unearned Title IV aid. From this R2T4 calculation, it was determined that the student had earned 21.5 percent of their Title IV aid which resulted in the institution returning \$4,308 in Direct Loan funds and \$166.50 in Federal Pell Grant Funds. The Title IV funds had been returned², as downward adjustments reflecting the said amounts were reflected in the Common Origination and Disbursement (COD) system.

¹ The Patient Care Technician Program is a 22 credit hour/ 930 clock hour program which is taught over a period of 28 weeks.

² The Title IV funds were returned after the 45 day timeframe.

Program	Amount	COD Action Date
Direct Unsubsidized Loans	\$2,721	3/27/2014
Direct Subsidized Loans	\$1,587	2/28/2014
Federal Pell Grant funds	\$166	3/3/2014

However, during the Department's review it was discovered that AHI incorrectly used the date that the institution withdrew the student (December 5, 2013) as the date of withdrawal for the R2T4 calculation. Moreover, the institution incorrectly used December 19, 2013, as the date of determination: it should have used December 5, 2013, which is the date on the institution's withdrawal form which included the said student's last date of attendance (11/21/2013).

Institutions that are required to take attendance, must use the last date of attendance as the date of withdrawal when performing an R2T4 calculation. Additionally, institutions that are required to take attendance are expected to have a procedure in place for routinely monitoring attendance records to determine in a timely manner when a student withdraws. Except in unusual instances, the date of the institution's determination that the student withdrew should be no later than 14 days after the student's withdrawal date (11/21/2013).

During the program review, the R2T4 calculation error was revealed. Due to this revelation, on April 9, 2014, AHI performed a second R2T4 calculation which resulted in the institution owing the Department an additional \$1,015 in Federal Pell Grant funds.

According to COD, the downward adjustments were made as of April 10, 2014.

Required Action: AHI must provide the Department proof of returning \$1,015 in Federal Pell funds as required by the second R2T4 calculation. Additionally, AHI must revise its R2T4 Policy/Procedures document to include a clear and accountable strategy to prevent future occurrences of this finding. In response to this finding, AHI must submit a revised R2T4 Policy/Procedures document to the Department.

Finding 3: Return of Title IV Funds (R2T4) Made Late

Citation: Per 34 C.F.R. § 668.22 states that when a recipient of title IV grant or loan assistance withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must determine the amount of title IV grant or loan assistance that the student earned as of the student's withdrawal date in accordance with paragraph (e) of this section.

(B) In the case of a program that is measured in clock hours, the student does not complete all of the clock hours and weeks of instructional time in the payment period or period of enrollment that the student was scheduled to complete; or

(b) Withdrawal date for a student who withdraws from an institution that is required to take attendance. (1) For purposes of this section, for a student who ceases attendance at an institution that is required to take attendance, including a student who does not return from an approved leave of absence, as defined in paragraph (d) of this section, or a student who takes a leave of absence that does not meet the requirements of paragraph (d) of this section, **the student's withdrawal date is the last date of academic attendance as determined by the institution from its attendance records.**

(3)(i) An institution is required to take attendance if—

(A) An outside entity (such as the institution's accrediting agency or a State agency) has a requirement that the institution take attendance;

(j) *Timeframe for the return of title IV funds.* (1) An institution must return the amount of title IV funds for which it is responsible under paragraph (g) of this section as soon as possible but no later than 45 days after the date of the institution's determination that the student withdrew as defined in paragraph (l)(3) of this section. The timeframe for returning funds is further described in §668.173(b).

Noncompliance: During the course of the review, three students were identified with having R2T4 calculations performed timely; however, the unearned Title IV funds associated with the respective R2T4 calculations were returned after the 45 day threshold. The table below provides student specific information.

Student Number	Withdrawal Determination Date	Title IV Program	Amount Returned	Date of Return (COD)	Days Late
24	12/5/2013	Pell Grant	\$2,721	3/27/2014	112
		Direct Unsub	\$1,587	2/28/2014	85
		Direct Sub	\$166	3/3/2014	88
8	3/14/2013	Direct Unsub	\$1,980	1/14/2014	306
		Direct Sub	\$1,447	1/14/2014	306
1	10/11/2012	Direct Sub	\$1,545	3/26/2013	166
		Pell Grant	\$1,008	3/25/2013	165

Required Action: AHI is required, as prescribed in 34 C.F.R. § 668.173, to determine the dollar amount of refunds that were made or should have been made for the 2012-2013 and the 2013-2014 award years to include the students listed in finding 3. In its response, AHI must provide to

the Department the results of the required file review in an Excel spreadsheet and in the following format:

- (1) Student's Name
- (2) Student's Social Security Number
- (3) Award Year
- (4) Title IV Refund by Program (Pell, Direct Loans, and FSEOG).
- (5) Determination Date
- (6) Date Due
- (7) Date Paid
- (8) Days Late

Submit the results of this review in an electronic Excel spreadsheet. **Return this file to Lonnie Seal by e-mail at Lonnie.Seal@ed.gov within 60 days of receipt of this letter.** This data will contain personally identifiable information and must be e-mailed as an encrypted WinZip file using Advanced Encryption Standard, 256 bit preferred. The password needed to open the encrypted WinZip file(s) must be sent in a separate e-mail.

Finding 4: Credit Balance Deficiencies

Citation: 34 C.F.R. § 668.164 (e) states whenever an institution disburses Title IV, HEA program funds by crediting a student's account and the total amount of all title IV, HEA program funds credited exceeds the amount of tuition and fees, room and board, and other authorized charges the institution assessed the student, the institution must pay the resulting credit balance directly to the student or parent as soon as possible but—

- (1) No later than 14 days after the balance occurred if the credit balance occurred after the first day of class of a payment period; or
- (2) No later than 14 days after the first day of class of a payment period if the credit balance occurred on or before the first day of class of that payment period.

34 C.F.R. § 668.165 states that a school is permitted to hold excess funds (credit balances) if it obtains a voluntary written authorization from the student or parent. If a school receives written authorization to hold excess funds, **the school must identify the student or parent and the amount of funds the school holds for the student or parent in a subsidiary ledger account designated for that purpose.**

Authorization to hold an FSA credit balance:

- All elements of an authorization to hold an FSA credit balance must be conspicuous. An authorization must include the following elements:
- **An authorization must explain what FSA funds are covered by the document, and it must specify the time period covered.**
- An authorization must clearly provide the student or parent with the information he or she needs to make an informed decision.
- The student or parent must be informed that he or she may refuse to authorize any individual item, that he or she may cancel such authorization at any time, and that a cancellation is not retroactive.
- A credit-balance authorization must provide detail that is sufficient to give the student or parent an idea of how the credit balance will be used.

However, regardless of any authorization obtained by a school, the school must pay any remaining balance on FSA loan funds by the end of the loan period and any other remaining FSA program funds by the end of the last payment period in the award year for which they were awarded.

Noncompliance: In several instances, AHI did not pay the credit balances to the student within 14 days after the credit balance occurred. Detailed information regarding the said students is included below.

Student #18: This student had a credit balance that occurred on 12/31/2013; however, it was not paid to the student until 1/24/2014.

In 3 instances, the following students had signed an authorization form to allow AHI to hold their respective FSA credit balances. However, because the credit balance authorization form specified that the time period was the current academic year,³ the institution was required to update the authorization for subsequent payment periods. Below is an excerpt from AHI's authorization statement as stated following the heading:

Authorization to Hold Title IV Funds for Additional Charges

"I understand that once my tuition and fee charges have been paid, my account may have a credit balance. Please retain the credit balance on my account to cover educational expenses

³ AHI defines its academic year as 24 credit hours.

that I will incur prior to the end of this academic year to assist me in managing my educational funds."

Because the student authorizations had expired, the said students should have received their credit balances within the 14 day timeframe. Detailed information regarding the said students is included below.

Student #20: This student had a credit balance authorization form that had been signed and dated; however, it had expired. The document was signed on 8/14/2012 and the academic year for this student ended around 6/20/2013. The credit balance occurred as of 9/23/2013; however, was not paid until 10/17/2013.

Student #25: This student had a credit balance authorization form that had been signed and dated; however, it had expired. The authorization was signed on 7/17/2012 and the academic year ended around 9/6/2013. The credit balance occurred as of 9/25/2013; however, it was not paid until 12/20/2013.

Student #29: This student had a credit balance authorization form that had been signed and dated; however, it had expired. The document was signed on 8/16/2012 and the academic year ended around 6/20/2013. The credit balance occurred as of 10/16/2013; however, it was not posted to the ledger as a refund until 2/28/2014.

A listing of the affected students is reflected in the following table:

Student Number	Date of Disbursement (Student Ledger)	Date of Credit Balance Check	Days from Disbursement to Credit Balance Check	Credit Balance Authorization
18	12/31/2013	1/24/2014	24	Not in student file
20	9/23/2013	10/17/2013	24	Expired
25	9/25/2013	12/20/2013	86	Expired
29	10/16/2013	2/28/2014 (Refund: Student Ledger)	135	Expired

Required Action: The institution must create a credit balance policy/procedure to ensure that credit balance payments are made to the student within 14 days after the disbursement occurred. Moreover, if AHI has its students sign student authorizations, it must develop procedures to ensure that it abides by the time period specified in the respective authorization and all other regulatory requirements listed in 34 C.F.R. § 668.165. In its response to this Program Review Report, AHI must include a written update of its Credit Balance Payment and Student Authorizations' Policy/Procedures to include an example of a revised student authorization form.

Finding 5: Inaccurate Record Keeping

Citation: 34 C.F.R. § 668.165 states that a school is permitted to hold excess funds (credit balances) if it obtains a voluntary written authorization from the student or parent. If a school receives written authorization to hold excess funds, **the school must identify the student or parent and the amount of funds the school holds for the student or parent in a subsidiary ledger account designated for that purpose.** A school may not require or coerce a student to provide written authorization, and a school must allow for cancellation or modification of the authorization at any time. The school must maintain, at all times, cash in its bank account at least equal to the amount the school holds for students. Because FSA Program funds are awarded to students to pay current year charges, notwithstanding any authorization obtained by a school from a student or parent, the school must pay any remaining balance on loan funds by the end of the loan period, and any other remaining FSA program funds by the end of the last payment period in the award year for which they were awarded. **If the U.S. Department of Education determines that the school has failed to meet financial responsibility standards, a limitation may be placed on the school preventing it from holding excess funds for any student.**

Noncompliance: The institution failed to list several students on its designated credit balance subsidiary ledger and identify the amount of funds that the institution held for said students. Detailed information regarding the said students is included below.

Student #6: The review of the individual student's account ledger revealed a credit balance occurred on 2/5/2014 in the amount of \$260. However, student's name and amount were not on AHI's credit balance ledger as of 3/31/2014.

Student# 28: The review of the individual student account ledger revealed a credit balance occurred on 2/26/2014 in the amount of \$2,085. However, student's name and amount were added during the program review.

Student #30: The review of the individual student's account ledger revealed a credit balance occurred on 2/5/2014 in the amount of \$2,285. However, student's name and amount were not on AHI's credit balance ledger as of 3/31/2014.

Required Action: The institution must institute or update procedures to ensure that all Title IV credit balances on student's ledger cards are identified and paid to the student in accordance with the above mentioned regulations. Moreover, if the institution maintains written credit balance authorizations, the institution must timely update its subsidiary ledger to identify the amount of Title IV funds the institution is holding for the students or parents as applicable. In response to this finding, a copy of the updated procedures must be submitted with the institution's response to this finding which addresses preventative measures to preclude future occurrences.

Finding 6: Leave of Absence (LOA) Deficiencies

Citation: 34 C.F.R. § 682.604(c)(4) A Leave of Absence (LOA) must meet certain conditions to be counted as a temporary interruption in a student's education instead of being counted as a withdrawal requiring a school to perform a Return calculation. If an LOA does not meet the conditions in 34 C.F.R. 668.22(d), the student is considered to have ceased attendance and to have withdrawn from the school, and the school is required to perform a Return calculation.

In order for an LOA to qualify as an approved LOA –

- the school must have a formal written policy regarding leaves of absence requiring that all requests for leaves of absence be submitted in writing and include the reason for the student's request;
- The student must follow the school's policy in requesting the LOA;
- There must be a reasonable expectation that the student will return from the LOA;
- The school must approve the student's request for an LOA in accordance with the school's policy;
- The institution may not assess the student any additional institutional charges, the student's need may not increase, and therefore, the student is not eligible for any additional Federal Student Aid;
- The LOA, together with any additional leaves of absence, must not exceed a total of 180 days in any 12-month period;
- Except in a clock-hour or non-term credit-hour program, a student returning from an LOA must resume training at the same point in the academic program that he or she began the LOA and
- **If the student is a Title IV loan recipient, the school must explain to the student, prior to granting the LOA, the effects that the student's failure to return from an LOA may have on the student's loan repayment terms, including the expiration of the student's grace period.**

34 C.F.R. § 668.22 (d)(3) (B) Requires students to provide a written, signed, and dated request that includes the reason for the request for a leave of absence prior to the leave of absence.

However, if unforeseen circumstances prevent a student from providing a prior written request, the institution may grant the student's request for a leave of absence, if the institution documents its decision and collects the written request at a later date.

Noncompliance: The school's LOA policy states that a leave of absence is to be granted if it meets all of the following conditions:

- The request must be made in writing by the student stating both the starting and ending dates [and] the reason for the leave of absence, and [include] a plan for completion of coursework.

- There must be reasonable expectation that the student will return from the leave of absence.
- The request must be approved by the Administrator.
- The initial leave cannot exceed 180 calendar days within a 12 month period.

Detailed information regarding the said students is provided below.

Student #5: This student's LOA form indicated that a leave of absence was granted for the period starting from 10/11/13 to 1/10/2014. The reason listed on the LOA form is "personal." Moreover, the request did not include a plan for the completion of the student's coursework. Ultimately, the form was not signed by the student.

Student #6: The student's LOA form indicated that a leave of absence was granted for the period starting from 1/29/2014 to 8/27/2012. The reason listed on the LOA form is that the student contracted Shingles. However, the request appears to have been filled out by a staff member, which is allowable, if the institution documents the request and collects the written request at a later date. It appears that the institution never collected the written request from the student.

Required Action: AHI must update its LOA Policy to include any missing elements discussed in the noncompliance section of this finding. Moreover, AHI must develop procedures to prevent future occurrences concerning the LOA discrepancies listed above. In its response to this program review report, AHI must submit a copy of its revised LOA Policy and Procedures to the Department.

Finding 7: Incomplete Verification

Citation: Pursuant to 34 C.F.R. § 668.16 [f], 668.51 through § 668.61, of the General Provisions regulations, and the (U. S. Department of Education's Application and Verification Guide.) an institution is responsible for verifying the information that is used to calculate an applicant's Expected Family Contribution (EFC) as part of the determination of need for student financial assistance. Information is verified by securing additional documentation or, in some cases, a signed statement attesting to the accuracy of the information provided. The regulations also require an institution to verify discrepancies in information received from different sources regarding a student's application for financial aid under the Title IV programs.

Noncompliance: AHI did not complete verification for student #6 who was selected for verification for the 2012-2013 award year. Detailed information concerning this student is included below.

Student #6: This student was selected for verification for the 2012/2013 award year. The U.S. taxes paid on the 2012-2013 ISIR was \$6,497; however, on the 2011 IRS Tax Return Transcript

it shows \$6,497 as Taxable Pension/Annuity Amount. Moreover, the Federal income tax withheld on the 2011 IRS Tax Return Transcript was \$4,171.

Required Action: The institution must recalculate the EFC for student #6. If the student's EFC, scheduled award and expected disbursement change as a result of the recalculation, the institution must provide the results with the response to this report.

If there is a change to the student's EFC, the institution will be liable for any over award disbursed for the 2012-2013 award year.

Furthermore, the institution must develop and submit with its response, policies and procedures which will ensure that, in the future conflicting information will be resolved and consistently applied to all students.

Repayment instructions if any will be provided in the Final Program Review Determination letter.

Finding 8: Unclear Audit Trail (Federal Supplementary Equal Opportunity Grant (FSEOG) Program)

Citation: The 2013 Blue Book, Volume 1, Chapter 5, pp.50-51 states, a school must keep fiscal records to demonstrate its proper use of FSA funds. A school's fiscal records must provide a clear audit trail that shows that funds were received, managed, disbursed, and returned in accordance with federal requirements.

Non-federal share of FSEOG

The school must ensure there is a nonfederal match of 25% of the total FSEOG awards. The nonfederal share of FSEOGs must be made from the school's own resources. These resources may include:

- institutional scholarships and grants;
- waivers of tuition or fees⁴;
- the nonfederal portion of state scholarships and grants; and
- funds from foundations or other charitable organizations.

Individual Recipient Basis Matching Method

The school ensures that the nonfederal match is made to each individual FSEOG recipient together with the Federal share in such a way that every student's FSEOG award consists of 75% federal funds and 25% qualified nonfederal funds. A school using this method

⁴ For the nonfederal portion of the FSEOG program, AHI reduces tuition.

calculates and documents on a student-by-student basis what portion of the student's FSEOG award comes from federal funds and what portion comes from nonfederal funds.

Noncompliance: For 2 students, AHI did not identify on the student's ledger the tuition reduction separately from the Federal portion of the FSEOG disbursement. Because the institution uses the individual recipient basis for its matching requirement, the institution is required to document on a student-by-student basis what portion of the student's FSEOG award comes from Federal funds and what portion comes from nonfederal funds as stated below in an excerpt from the 2013 Blue Book, Volume 7, page 7-17:

In each instance, the reviewers did not have a clear audit trail to evaluate regulatory compliance. Information regarding specific instances are noted below.

Student #21: This student's award letter indicates that the student will receive \$150 in FSEOG listed under "grants." Moreover, listed under "other" indicates that the student will receive an additional \$50 for FSEOG. However, on the student's ledger for Term 3 an amount of \$200 is listed for FSEOG. AHI's matching portion is not evident with its process for managing the FSEOG program.

Student #30: This student's ledger for Term 2 shows an amount of \$200 posted for FSEOG. As previously stated, AHI's matching portion is not evident with its process for managing the FSEOG program.

Required Action: A copy of the updated policy/procedures must be submitted with the institution's response to this finding which addresses specifically how the institution will document its FSEOG matching requirement in order to ensure meticulous compliance with all regulatory requirements.

Finding 9. Consumer Information Requirements not Met

Citation: Higher Education Opportunity Act of 2008 (HEOA)

In accordance with the Higher Education Opportunity Act of 2008 (HEOA), by October 29, 2011, each postsecondary institution that participates in Title IV federal student aid programs must post a net price calculator on its website that uses institutional data to provide estimated net price information to current and prospective students and their families based on a student's individual circumstances. This calculator should allow students to calculate an estimated net price of attendance at an institution (defined as cost (price) of attendance minus grant and scholarship aid) **based on what similar students paid in a previous year**. The net price calculator is required for all Title IV institutions that enroll full-time, first-time degree- or certificate-seeking undergraduate students.

Noncompliance: The Net Price calculator at AHI does not allow students to accurately calculate an estimated net price of attendance at their institution (defined as cost (price) of attendance minus grant and scholarship aid) based on what similar students paid in a previous year.

For example, the result for the estimated total grant aid was \$0 when the reviewer recently tested AHI's Net Price Calculator⁵ computer wizard based on selected hypothetical criteria listed below:

Program: Medical Assistant Program

1. Financial Aid: Yes
2. Age: 50
2. Living Arrangement: Living on my own or with a roommate
3. Marital Status: Yes
5. Number in family: 6 or more
6. Number in college: 2 or more
7. Household Income: Less than \$30,000

Academic Year 2009-2010 (data)	
Estimated total price of attendance	\$19,519
a. Estimated tuition and fees	\$8,740
b. Estimated room and board	\$7,322
c. Estimated books and supplies	\$800
d. Estimated other expenses	\$2,657
Sub-Total	\$19,519
Estimated total grant aid:	\$0
Estimated total net price:	\$19,519
(Price of attendance minus grant aid)	

Specific Net Price Calculator Errors:

1. In general an independent student with 6 or more members in their family whose household income is below \$30,000 would be eligible to receive Federal Pell Grant funds.

Required Action: AHI must upload the latest version of the Net Price Calculator (NPC) template to ensure that it yields accurate estimates in accordance with the Higher Education Opportunity Act of 2008 (HEOA). For detailed instructions on how to complete this requirement go to: http://nces.ed.gov/ipeds/resource/net_price_calculator.asp.

⁵ See snap shots printed from AHI's Net Price Calculator in Appendix B.

In response to this finding, the institution must provide the link to where the updated Net Price Calculator is located on AHI's website and a written statement addressing when this requirement was completed.

Appendices

Appendix A

American Health Institute
Student Sample PRCN: 2014-3-04-28569

	SSN	NAME	FIRST NAME	Award Year
1				12/13
2				12/13
3				12/13
4				12/13
5				12/13
6				12/13
7				12/13
8				12/13
9				12/13
10				12/13
11				12/13
12				12/13
13				12/13
14				12/13
15				12/13

	SSN	NAME	FIRST NAME	Award Year
16				13/14
17				13/14
18				13/14
19				13/14
20				13/14
21				13/14
22				13/14
23				13/14
24				13/14
25				13/14
26				13/14
27				13/14
28				13/14
29				13/14
30				13/14